

REMARKS

Claims 4-17 are currently pending in this Application. Claims 4, 6, 7 and 15 have been amended. No new matter has been introduced as a result of this amendment. Favorable reconsideration is respectfully requested.

Claims 4-7 and 10-15 stand rejected under 35 U.S.C. §102(b) as being anticipated by *Singh et al.* (US Patent 6,400,376) Claims 8 and 9 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Minakuchi et al.* (US Patent 5,844,547). Applicants respectfully traverse these rejections.

Specifically, *Singh* does not disclose “detecting specification of a second point on said display panel that corresponds to a graphic object” and “executing the second processing mode when the detection means detects the second point on said touch-sensitive display panel while said first point is actively detected” as recited in claim 1 and similarly recited in claims 4, 6-8, 10 (referred to as “graphic image”) and 15. *Singh* discloses a display control, wherein buttons (56, 58) are disposed at the side of a device (FIG. 4). *Singh* teaches that the buttons (56, 58) are used as a type of scroll-lock (“panning”) where the buttons are used to prevent unwanted scrolling of an oversized screen being viewed by a user (col. 1, lines 46-65; col. 5, lines 63-67). Under the FIG. 4 embodiment of *Singh*, the buttons are similarly used to control pointer 50 movement through a stationary screen (col. 8, lines 5-22). These configurations are used to address portable devices that have sensors that sense changes in position of the housing, particularly where users tip the device in a certain direction to pan the screen (col. 4, lines 49-65). *Singh*, however, is silent regarding executing processing with regard to an object being selected by a user.

Under the embodiment of FIGs. 2-3 (see also col. 9, lines 37-42), *Singh* teaches a display screen having a plurality of sub-pages (col. 7, lines 17-26). The sub-pages are each partially displayed within the screen (see FIGs. 2 & 3) to allow a greater portion of information to be displayed. Once a user selects a particular sub-page, the sub-page is panned into a “full screen” display, allowing the user to view the entirety of the page (col. 7, lines 30-55). Again, *Singh* does not teach or mention the processing of objects within the page.

The processing of an object shown on a display is materially different from scrolling (or “panning”) a page generated on a screen. Furthermore, the claims recite features that are in means-plus-function format. The “broadest reasonable interpretation” that an examiner may give

means-plus-function language is that statutorily mandated in paragraph six. 35 U.S.C. 112, sixth paragraph states that a claim limitation expressed in means-plus-function language "shall be construed to cover the corresponding structure described in the specification and equivalents thereof." Accordingly, the PTO may not disregard the structure disclosed in the specification corresponding to such language when rendering a patentability determination (see MPEP 2181).

The structure in the specification clearly discloses a two-point graphic processing system and method, wherein the exemplary embodiments of FIGs. 4-8 (see specification pages 7-11) teach the identification and extrapolation of coordinate data points to perform processing on a graphic object (specification page 9). In contrast, *Singh* simply discloses a scroll-lock and viewing mechanism for accessing partial displays. Accordingly, *Singh* does not teach all the elements of the presently claimed invention. And it is respectfully requested that the rejection under 35 U.S.C. §102(b) be withdrawn.

With regard to claims 8 and 9, and in addition to the arguments above, the *Minakuchi et al.* reference relates to an apparatus for manipulating the display of an object on a display surface by sensing touching contacts on a touch panel. The reference teaches contacting one coordinate on the display surface to perform various manipulations such as scrolling and pushing the object on the display. The reference also teaches a "pick manipulation" in which an object is picked up at one position on the display surface and placed at another position. The pick manipulation is performed by contacting two sets of coordinates on the display panel, for example using a thumb and an index finger (col. 3, lines 55-62 and col. 4, lines 36-67). Thus, the *Minakuchi et al.* reference teaches using two sets of coordinates (X-Y) for performing the same operation.

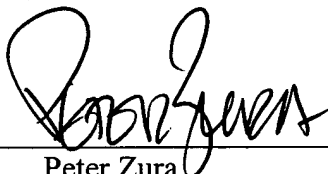
Claim 8 recites a coordinate position input apparatus including, among other things, features for outputting a coordinate data of a middle point when two points are simultaneously touched. The Office Action states that these features are disclosed in the *Minakuchi* reference for "conducting a manipulation in such a way that the object is pushed off its center." The portion of the reference cited in the Office Action (col. 6, lines 38-42) describes an operation for performing a push-while rotate manipulation, which requires only a one touch position on the touch screen as shown in Fig. 8(b)-8(c). Further, the table in Fig. 8(c) only discloses one position on the screen display as indicated by a single coordinate X-Y. As such, the *Minakuchi* reference cannot output a coordinate data of a middle point "when two points are simultaneously

touched” since only one point on the display screen is required to perform the intended object manipulation. For this reason, claim 8 and its dependent claim 9 are also allowable over *Minakuchi et al.*

Accordingly, the Applicant respectfully submits that the present invention is allowable over the *Minakuchi et al.* reference. Withdrawal of the rejection is respectfully requested, and an early Notice of Allowance is earnestly requested.

Respectfully submitted,

BELL, BOYD & LLOYD LLC

BY 
Peter Zura
Reg. No. 48,196
P.O. Box 1135
Chicago, Illinois 60690-1135
Phone: (312) 807-4208

Dated: October 19, 2004